**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, DC 20554**

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|---|---|---|
| In the Matter of | ) | |
| | ) | |
| **Qwest Communications** | ) | **WC Docket No. 03-11** |
| **International Inc.** | ) | |
| | ) | |
| Consolidated Application fur Authority | ) | |
| to Provide In-Region, InterLATA Services | ) | |
| in New Mexico, Oregon, and South Dakota | ) | |

**DECLARATION OF GARY L. NOBLE**

**Cricket Television Commercial**

**TABLE OF EXHIBITS**

| Exhibit | Description |
| --- | --- |
| Exh. GLN-Cricket-1 | Certified Transcript of Cricket Television Commercial |

Before the
FEDERAL COMMUNICA'CIONS COMMISSION
Washington, DC **20554**

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| In the Matter of | ) | |
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| Qwest Communications | ) | WC Docket No. 03-11 |
| International Inc. | ) | |
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| to Provide In-Region, InterLATA Services | ) | |
| in New Mexico. Oregon, and South Dakota | ) | |

## DECLARATION OF GARY L. NOBLE

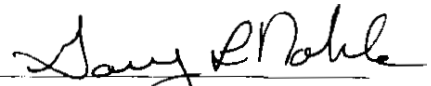### Cricket Television Commercial

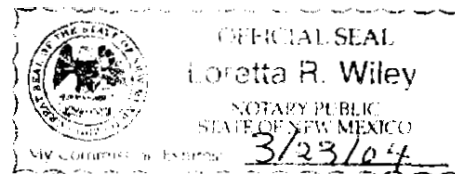Pursuant **tu** 47 C.F.R. § 1.16, Gary L. Noble declares as follows:

1.      My name is Gary L. Noble.  I am employed as an Executive

Manager by Albuquerque Media Monitoring, a New Mexico electronic clipping

agency.  My business address is 7911 Mountain Road NE, Suite G, Albuquerque,

New Mexico 87110.

2.      Attached to this declaration. as Exh. GLN-Cricket-1, is a

transcript of a Cricket television commercial that was broadcast in the Albuquerque

Media Market on February 20, 2003 at approximately 10:45 p.m. nn channel 7

(KOAT/ABC affiliate)  I personally transcribed the Cricket commercial.  The Cricket

commercial can be viewed at http://www.qwest.com/about/policy/ldReentry/files-

jan15/multimedia/cricket_spot.mpg.

3      This concludes my declaration.

# VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.
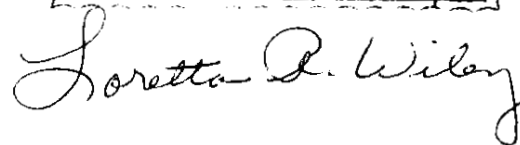
Executed on _Feb 25_____, 2003

_____
Gary L. Noble

_Loretta R. Wiley_

# EXHIBIT GLN-CRICKET-1

# CERTIFIED TRANSCRIPT OF CRICKET TELEVISION COMMERCIAL
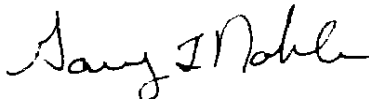
**Cricket Television Commercial**

**7** seconds of music and home telephones moving out of houses on *to* the street as crickets carry them down the street and throw them off a cliff...

Announcer: Everywhere you look home phones are being replaced; by Cricket. Cricket service works just like your home phone with all the local calls you want for one low predictable price plus plenty of free long distance, so why pay for both. Cricket, it could be your only phone.

Get a hundred dollars off any Cricket phone, buy a Nokia and get fifty dollars in free movies.

Certification:

I Gary L. Noble, certify this Cricket commercial was broadcast in the Albuquerque Media Market on February 20, 2003 at approximately 10:45 p.m. on channel 7 (KOAT/ABC affiliate). I personally transcribed the commercial based on the audio provided.

*Gary* L. Noble
Executive Manager
Albuquerque Media Monitoring
791 1 Mountain Rd. NE, Ste. G
Albuquerque, NM 87110
505-266-6037

**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**

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| to Provide In-Region, InterLATA Services ) | |
| in New Mexico, Oregon, and South Dakota ) | |

**REPLY DECLARATION OF LYNN M V NOTARIANNI**
**& CHRISTIE L. DOHERTY**

**on**

**Operations Support Systems**

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| REPLY EXHIBIT NO. | DESCRIPTION |
|---|---|
| Reply Exh LN 1 | Excerpt from Systems Interactive Report for SCR0903002-05, Single Source Document for Implementing EDI |
| Reply Exh. LN-2 | Proposed Documentation Change for Feature Identification |
| Reply Exh. LN-3 | Excerpt from Systems Interactive Report for SCR062702-09ES, Relaxing the Edit on Ten Digit "Forward To" Numbers |
| Reply Exh. CLD-4 | CMP Notice on NKM/NKS USOC |

**Before the**
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. **20554**

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| In the Matter of | ) | |
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**REPLY** DECLARATION OF LYNN M **V** NOTARIANNI
& CHRISTIE **L.** DOHERTY

Checklist Item **2** of Section **271(c)(2)(B)**
Operations Support Systems

**1**      Pursuant to 47 C F R § 1 16, Lynn M V Notarianni and

Christie L. Doherty declare as follows:

2.      My name is Lynn M V Notarianni.  I am a Senior Director

in Qwest IT, Inc., a unit of Qwest.  My business address is 930 15th Street,

Denver, Colorado 80202.  I am the Declarant in connection with Sections I, II,

III(B) and (D) of this Reply Declaration

3.      My name is Christie L. Doherty-.  I am Vice President –

Wholesale Service Delivery at Qwest Services Corporations, a unit of Qwest

My business address is 1005 17th Street, Room 1750, Denver, Colorado 80202.

I am the Declarant in connection with Sections III(A) and (C) of this Reply

Declaration

4.      The purpose of this Reply Declaration is to respond to arguments regarding OSS and EDI documentation raised in the Comments of WorldCom, Inc. and the accompanying Declaration of Sherry Lichtenberg, and to respond to the Comments of AT&T regarding certain loop qualification language in Qwest's Oregon SGXT.' Information relevant to these contentions that is already in the record of this proceeding generally will not he repeated in this Reply Declaration.

## I.      EDI DOCUMENTATION

5.      The Commission already has evaluated the adequacy of Qwest's EDI documentation and concluded that, it meets the requirements of Section 271.   Specifically, the Commission held that "Qwest provides sufficient documentation to allow competitive LECs to design their OSS interfaces."   The Commission relied heavily on the fact that numerous CLECs had successfully developed EDI interfaces and gone into production using those interfaces.' As discussed in the OSS Declaration, as of December 1, 2002, a total of 31 individual CLECs had done *so,* and the transaction volumes transmitted were substantial.

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Hereafter "WorldCom Comments," "Lichtenberg Declaration," and "AT&T Comments."

*Qwest 271 Order* at ¶ 144.

*Id.*

*Id.*

Declaration of Lynn M V Notarianni and Christie L. Doherty on Operations Support Systems ("OSS Decl.") at ¶ 612, 633.

6.      KPMG and Hewlett-Packard ("HP"), the pseudo-CLEC in the Regional Oversight Committee ("ROC") Third Party Test,, also concluded that Qwest's documentation was adequate to enable a CLEC to build an EDI interface.   HP also successfully built an EDI interface using Qwest's EDI documentation and working with Qwest's EDI implementation team.   HP conducted certification activities for a broad range of products (including UNE-P) over the EDI interface it had constructed, across four IMA-EDI releases. '   It is also noteworthy that at least one CLEC and a pseudo-CLEC have been able to construct and implement an EDI interface using Qwest's documentation **in** a relatively- short time.

7.      WorldCom suggests in its Comments that because WorldCom is targeting mass market customers through UNE-P, it experienced problems with Qwest's EDI documentation that other CLECs would not have had occasion to experience.   WorldCom implies that evidence that other CLECs have successfully built EDI interfaces using

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*See id.* at ¶¶ 636-613

*Id.* at ¶ 639.

For three ut the four releases, the products on which HP conducted certification activities included UNE-P. As noted in the OSS Declaration at ¶ 639, the products on which HP conducted certification activities on can be found in the *Final Report* at Table 12B-1.1 (P-CLEC IMA-EDI Certified Functionality). During this test, HP certified 13 pre-order transactions, IC; products. and five post-order transactions. *See id.* at 12-B-11 – 12 (HP); Interim Report of the P-CLEC, Version 2.0, March 31, 2001 ("HP Interim Report") (Attachment 5, Appendix G), at 63.

*See* OSS Decl. at ¶ 633; Confidential Exhibit LN-OSS-155 (Experiences of Two CLECs in Implementing EDI Interfaces).

WorldCom Comments at *i-ii*, 8-9, Lichtenberg Decl. at ¶ 2.

Qwest's EDI documentation therefore is invalid. ' The reality does not bear out this claim. In fact, high volumes of EDI transactions have been successfully submitted before. As noted in the OSS Declaration, during the 12-month period ending November 30, 2002, 21 individual CLECs had submitted a total of 1,400,000 preorder transactions via EDI and 22 individual CLECs had submitted a total of 700,000 order transactions via EDI. HP also submitted substantial volumes of EDI transactions in the Third Party Test. For Test 12, the Pre-Ordering, Ordering, and Provisioning (POP) Functional Evaluation, HP transmitted *a* total of 17,486 pre-order transactions via EDI and 9,656 order transactions over EDI. "

8.     Moreover, many of the order transactions submitted by CLECs have been for resale or UNE-P. During the 12 month period ending January 31, 2003, a total of over 69,000 EDI resale POTS and EDI UNE-P POTS conversion order transactions were submitted regionwide. '

9.     Thus, there does not appear to be anything about volumes or the nature of the product or target customer base that would explain why WorldCom's experience in using Qwest's EDI documentation would differ from that of HP or the other CLECs. As the Department of Justice observed,

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*Id.*

OSS Decl. at ¶633; Confidential Exh. LN-OSS-153 (CLEC Pre-Order Volumes); Confidential Exh. LN-OSS-154 (CLEC Pre-Order Volumes).

*Final Report,* Tables 12-8 and 12-15

The number of resale POTS orders transmitted is relevant to WorldCom's EUI documentation point, since for purposes ot EDI documentation and interface coding, resale and UNE-P orders *are* essentially the same.

'WorldCom neither presents detailed underlying data nor explains why its experience using its own systems **appears** to have been more negative than that using Z-Tcl's systems." DOJ Evaluation at 8 n.32. Indeed, it was not until WorldCom filed comments on October **15,** 2002, in connection with the refiled Qwest nine-state application, that *any* party took issue with Qwest's showing. Nor has any other party in connection with this application taken issue with the adequacy of Qwest's EDI documentation.

10.     Because Qwest's EDI documentation is the same across its **14** states, the Commission's conclusion (and the results of the Third Party Test) apply equally to this Section 271 application. Nothing in WorldCom's comments calls into question the Commission's previous conclusion. WorldCom cites a few instances in which it alleges that its EDI interface did not function correctly, and that its orders for that reason were rejected, citing alleged deficiencies in Qwest's EDI documentation. '' As discussed below, for the most part the cited instances involved situations in which WorldCom interpreted the documentation in a way that other CLECs had not, and that Qwest had not anticipated. Qwest's EDI implementation team has worked closely with WorldCom throughout its development process to help clear up any confusion that WorldCom might have experienced. This technical assistance is a normal and integral part of the interface development process. Qwest also revises the EDI documentation on a going-forward basis as

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*See* WorldCom Comments at 17-18, Lichtenberg Decl. ¶¶ 29-31

needed. This also is a normal part of the documentation development, process and is lo be expected.

11. The change management procedures, which were adopted collaboratively by the CLECs and Qwest, contemplate that changes will be made tn the documentation on an ongoing basis where clarification *or* revision is needed. The production support procedures also contemplate that issues identified during production will be relayed to CLECs who might be affected and that changes to the systems and/or documentation may be made as a result. This responsiveness to documentation and other issues identified by CLECs during the EDI development process is an expected and important part of that process.

12. In the *Qwest 271 Order,* the Commission acknowledged that WorldCom's change request regarding a single source for EDI documentation was being handled through the change management process. ' That change request ("CR") has been discussed in several CMP meetings by CLECs and Qwest. In the January 28, 2003, meeting, Qwest provided a level of effort for the request and discussed with CLECs the

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See, *e.g.*, Change Management Declaration of Dana L. Filip, Exhibit DLF-CMP-2, Qwest Wholesale Change Management Process Document, § 8.1.5 ("CMP Framework')).

CMP Framework at § 12.

See Qwest 271 Order, ¶ 55, n.180.

*Id.*

possibility of breaking the CR into parts so that it could be implemented over the space of more than one release.

13.    The most recent meeting on this CR was held on February 20, 2003. The CLECs and Qwest will conduct further discussions at the next CMP meeting in March regarding the formulation of the Worldcorn CR, and will discuss other EDI documentation clarifications or format changes that Qwest might be able to accomplish without a CR. The CMP parties also agreed that, it would be *a* good idea *to* develop a process by which proposed clarifications to docurnentation or format changes could be brought before the Qwest/CLEC CMP group, so that CLECs would be able to have input on any changes. As is clear from these meetings, the CMP process provides a forum for considering proposals for change to the format or detail of EDI documentation, and it, is important for all CLECs to be aware of the need for and shape of any such documentation changes.

14.    The "ten guidelines" identified by WorldCom in its Comments also have been discussed at CMP meetings in connection with the WorldCom CR.   In general, Qwest already follows these principles when it

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See Reply Exh. LN-OSS-1 (Excerpt from Systems Interactive Report for SCR0903002-05. Single Source Document for Implementing EDI) (January 28, 2003, Meeting Minutes). This exhibit contains the minutes of the CMP meetings where this CR was discussed. It can also be found at the following URL: www.qwest.com/wholesale/downloads/ 2002/cmp/CLECQwestCMP_SystemsInteractiveReport.PDF.

*See id.* (January 28, 2003 Meeting Minutes). The WorldCom guidelines also were discussed at the most recent CMP meeting, on February 20, 2003. The minutes for this meeting were not yet available at the time this Declaration was filed, but will be available soon at the following URL: www.qwest.com/wholesale/downloads/2002/cmp/ CLECQwestCMP_SystemsInteractiveReport.PDF.

clarifies or revises its documentation, and has done so for some time now. Qwest has agreed to address these principles when the WorldCom CR is worked.

## II. ORDER REJECTS RELATING TO EDI DOCUMENTATION

### A. Feature Identification

15. Conversion orders submitted through Qwest's OSS currently require a carrier to distinguish between the features the end user wishes to retain (based on its existing service) and new features the end user seeks to add. This requires the carrier to identify the existing features on the end user's account by examining the CSR. The CSR for a single line account typically identifies each feature without repeating the telephone number ("TN") after it because, by definition, each such feature is associated with that single line. For multi-line accounts, the CSR lists the TN after each feature so it is clear to which line that feature applies.

16. Although Qwest's EDI documentation does not explicitly distinguish between the feature detail on the CSR for single- and multi-line accounts, the difference should have been taken into account by CLECs. This is because Qwest's Developer Worksheets, which are part of the EDI

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*See id.* (January 28, 2003 Meeting Minutes)

While it is possible for a single-line account to include the TN after feature information (if the order was coded that way), the absence of a TN after certain features does not mean that those features do not exist on the account. WorldCom programmed its EDI to treat only those features followed by TNs as existing features, but this assumption is incorrect and should not have been made.

Disclosure Document, identify feature detail as "optional,"which means that a feature can appear on a CSR without additional detail such as a TN. [2]

17.    WorldCom apparently designed its EDI interface to seek and extract feature information only when associated with a TN, which, as noted above, occurs primarily **in** connection with multi-line accounts. According to WorldCom, because feature information for single line accounts does not always include the TN after each feature, WorldCom's orders for single line accounts did not identify any existing features and thus designated all of the features the end user was ordering as new. This, in turn, prevented WorldCom's orders from correctly distinguishing between features the end user wished to retain and those it sought to add, resulting in a reject when the order was submitted.

18.    When WorldCom notified Qwest that it was experiencing these rejections, Qwest agreed to make its EDI Development Team available *to* assist WorldCom during the weekend it planned to code its changes. [3]   But, WorldCom did not contact Qwest's EDI Development Team that weekend, and WorldCom now alleges that, Qwest "refused to announce" the difficulties

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*See* LN-OSS-9 (IMA-EDI Appendix A – Developer Worksheets – Pre-Order) Disclosure Document) at App. A, p. 40.

*See* WorldCom Comments at 9-10, Lichtenberg Decl. at ¶ 8

Although Qwest's service manager at first indicated to WorldCom that she believed CSR distinctions between single- and multi-line accounts were limited to the Eastern region, she told WorldCom that she would have to investigate the matter further. The very next day, after receiving additional information from WorldCom, she notified WorldCom that the distinctions applied to all regions.

WorldCom experienced to other CLECs. ‾ But, as noted above, Qwest's EDI
Developer Worksheets already identify feature detail as "optional." Moreover,
Qwest notified the CLEC community of a proposed change to the PCAT to
add clarifying information about the difference between single- and multi-line
accounts on February 17, 2003. ˙ Based on CMP guidelines, the change will
become effective no later than March 10, 2003, after CLECs have had an
opportunity to comment. ' *So,* contrary to WorldCom's assertions, Qwest has
made the distinction between single- and multi-line accounts in this context
readily apparent to CLECs.

B. Area Codes on "Forward To" Numbers

19. Qwest's documentation specified that, when placing an
order for call forwarding, the old "forward to" number (which currently must
he provided) needs *to* include ten, not just seven, digits. Specifically, the
negotiated business rules in Qwest's EDI Disclosure Document specify that
feature identification detail accompanying call forwarding USOCs (CFN,
CFNB and CFND) should include ten digits.

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*See* WorldCom Comments at 11, Lichtenberg Decl. at ¶ **12**

Per WorldCom's request, end in order to allow all CLECs to be able to comment on
thr proposed dncuinentation update, Qwest issued a Level II product and process change
notification rather than a Level I notification. A Level I notification would have enabled
Qwest *to* effectuate the change more quickly because Level I changes do not require CLEC
input.

*See* Reply Exh. LN-2 (Proposed Documentation Change for Feature Identification) at
3, *also available at* www.uswes'.com:/wholesale/cmp/review.html.

*See* Qwest IV, Att. 5. App. P (Qwest EDI Disclosure Document) at Appendix C, p. 125,
reference line 60, *also available at* www uswest.com/disclosures/netdisclosure409.html

*20.* Moreover, Qwest is implementing a CMP CR, with a target date of February 28, 2003, that will relax the edit that currently requires a ten digit telephone number. In June *2002,* a different CLEC, Eschelon, submitted **a** request through CMP that old "forward to" numbers no longer require ten digits on orders for call forwarding. But, when this CR was discussed at a Change Management meeting in July 2002, it was prioritized as 36th (out of 60 CRs) by all CLECs, and, notably, even lower (42nd out of 60 CRs) by WorldCom. Eschelon's CR therefore did not qualify for EDI version 12.0 and instead became a candidate for EDI version 13.0." Because this issue has since grown in importance to CLECs, Qwest is, as noted above, implementing the change on an expedited basis with a target date of February 28, 2003.

21. Qwest's implementation of a "Migrate-as-Specified" feature in EDI version 12.0 should also help resolve WorldCom's concerns in this area, as CLECs will no longer have to distinguish between new and existing features; nor will CLECs have to identify the "change from" existing

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*See Reply Exh. LN-3* (Excerpt from Systems Interactive Report for SCR062702-09ES, Relaxing the Edit on Ten Digit "Forward To" Numbers), *also available at* www.qwest.com/wholesale/cmp/changerequest.html.

Notably, when this CR was prioritized by CLECs for EDI version 13.0 on December 19.2002 (which predated WorldCom's initiation of new, conversion and disconnect orders in Qwest's region by less than four weeks). WorldCom still prioritized it at a relatively **low** 14 (out of 50 CRs).

feature detail when making changes (such as changing the call "forward to" number) on their conversion LSRs. ··

## III. OTHER OSS ISSUES RAISED IN THE COMMENTS

### \. Updating USOC Tables in Oregon

22.     WorldCom claims that its orders requiring a "Touch Tone Business" ("TTB") USOC were rejected **in** Oregon because Qwest did not properly code its back-end tables to accept that, USOC in that state. ·· The majority of Qwest's systems no longer require the submission of a TTB USOC with an order because touch tone service is now standard in most states. Neverlheless, the TTB USOC is required in certain areas, including locations in South Dakota.

*23.*     Initially, Qwest incorrectly informed WorldCom that the TTB USOC was required in Oregon, but Qwest rectified the matter expeditiously. When WorldCom began submitting orders with TTB USOC based on information provided by Qwest, WorldCom experienced rejects and reported this to Qwest on January 21, 2003. To resolve this, Qwest agreed to add the TTB USOC to the necessary tables in Oregon a few days later, by January 27, 2003, to allow the LSRs to be accepted in that state. As a result,

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It is not clear *to* Qwest why WorldCom believes that the "Migrate-as-Specified" feature Qwest plans to implement in EDI version 12.0 will continue to require feature detail for "complex" features such as call forwarding. **See** WorldCom at 14. Lichtenberg Decl. at ¶ 19. To be clear, carriers will not be required to specify an old "forward to" number when using "Migrate-as-Specified." Only the new call "forward to" number will, of course, be required.

*See* WorldCom at 11-15, Lichtenberg Decl. at ¶¶ 20-21

WorldCom was able to continue ordering without modifying its internal procedures and without experiencing any affect on the provisioning process.

24.     Without providing any specifics, WorldCom claims that, beginning February 1, 2003, orders containing "RCU' ' and "NKS" '' USOCs were rejected in a manner "similar" to its TTB-related rejects.    With respect to the RCU USOC, Qwest's PCAT states clearly that Call Curfew – the feature associated with the RCU USOC – uses Qwest's Advanced Intelligence Network and therefore is not available for UNE-P orders, which are the type of orders WorldCom submits. '' Thus, to the extent WorldCom was submitting UNE-P orders with KCU USOCs, they could not have been accepted by Qwest's systems and should have been – and indeed were – rejected.

25.     As for WorldCom's claim regarding the NKS USOC, Qwest's PCAT could have been clearer, but this issue affected only a small number of WorldCom orders.  Specifically, between January 18 and February 14, 2003, only four WorldCom orders were rejected because of the inclusion of an NKS USOC.  Both NKS and the USOC "NKM" represent the Caller ID Blocking feature; but, service provisioned through UNE-P requires that the

---

Qwest's KCU USOC relates to a "Call Curfew" feature, which enables end users to set time-of-day restrictions on incoming and outgoing calls.

Qwest's NKS USOC relates to a "Caller ID Blocking" feature

*See* WorldCom at 15, Lichtenherg Decl. at ¶ 22

*See* Call Curfew Section of PCAT, *available at* www.qwest.com/wholesale/clecs/features/call_curfew_html; UNE-P Section of PCAT, *available at* www.qwest.com/wholesale/pcat/uneppots.html (noting that "products that are not available with UNE-P . . . [include] . . . Advanced Intelligent Network (AIN) services").

NKM IJSOC be used. WorldCom, which uses UNE-P, submitted orders for Caller ID Blocking with the NKS, not NKM, USOC, which is why those orders were rejected.

26. Qwest has notified CLECs that it has initiated a change to enable CLECs to use either the NKS or NKM USOC to request Caller ID Blocking. -- Qwest also has made clear to CLECs that, in the interim, they should use only the NKM USOC to request this feature. " Specifically, on February 25, 2003, Qwest issued a notice pursuant to the CMP initiating its change. Pursuant to the CMP, CLECs will have 15 days to submit comments on Qwest's notice, and Qwest will then have 15 days to respond to the CLECs' comments with a final proposal notice. From that point, Qwest's final notice will become effective 15 days thereafter, which means that the option of submitting either USOC should be available by April 11, 2003, at the latest. The implementation of this change should resolve any concerns CLECs may have about which USOC they should be submitting.

B. Address Validation for Second Lines

27. WorldCom contends that some of its orders are rejected because it is unable to validate addresses for second lines by inputting the

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Qwest learned that WorldCom was simply copying the USOCs from the existing account to the account it was converting. This resulted in WorldCom requesting the NKS USOC even though its use of UNE-P required it to use the NKM USOC.

Reply Exh. CLD-4 (CMP Notice on NKM/NKS USOC). Either IJSOC will provide the Caller ID Blocking functionality. Allowing the use of either USOC will facilitate conversions to UNE-P when CLECs simply copy the USOC from the existing account.

*See id.*

end user's telephone number into PREMIS, which is the data source for Qwest's address validation tool    It is unclear to Qwest, however, why WorldCom insists on using Qwest's address validation tool in this manner. Qwest's documentation states explicitly that, address validation by TN can only be performed on "Main" or "Billing" telephone numbers. [15]  Second lines do not qualify as "Main" or "Billing" telephone numbers, which is why they should he validated by address.

28.    Qwest's address validation tool is not well-suited for address validation by TN because its source is an address database (PREXIIS) that does not contain all working services or telephone numbers for a given address.  Qwest's documentation therefore informs CLECs to validate addresses by typing the end user's address, rather than TN, into the tool. [16]  Nevertheless, WorldCom seems to insist on attempting to validate end user address information by TN.  But doing so, as WorldCom now realizes, is not optimal because not all TNs can be accommodated – and thus be read by – the address validation tool.

29.    WorldCom claims that the process of typing end user addresses (rather than TNs) into the address validation tool is cumbersome

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*See* WorldCom at 15-16. Lichtenberg Decl. at ¶¶ 23-25

*See* Attachment 5. Appendix P (Qwest EDI Disclosure Document) at Chapter 4.1. page 2. first paragraph; *also available at* www.uswest.com:/disclosures/ netdisclosure109.html; *see also* Pre-ordering Overview PCAT, Frequently Asked Questions (FAQs) No. 4. *available at* www.qwest.com/wholesale/clecs/ preordering.html.

Precise addresses may not he available for certain rural end users whose premises may, for example, he identified by milepost along a highway.

and prone to keystroke errors by its service representatives. [1] But such keystroke errors are equally possible when typing TNs, and WorldCom offers no evidence that the former would lcird to fewer keystroke errors than the latter. Regardless, the "near-match" capability of Qwest's address validation tool – which results in multiple potential responses being returned when minor keystroke errors are made – renders WorldCom's argument moot. In fact, WorldCom can use the near match capability to select the correct address and then automatically populate the address fields on the LSR.

30. Even though the FCC has never required it, *see Qwest 271 Order* at ¶ 56, Qwest is scheduled to implement a Migrate-by-TN function in EDI version 12.0, which will enable CLECs to submit UNE-P conversion LSRs based on the TN and minimal address information.

C.    Process for Updating CSRs

31. WorldCom complains that it takes Qwest too long to update CSR information, and that the requirements for submitting subsequent, requests on a conversion LSR before the CSR has been updated is cumbersome.    But CLECs use the same process as Qwest to submit subsequent orders before the CSR has been updated, and, thus, the process cannot be – and is not – discriminatory.

32. Nevertheless, to improve the CLEC experience in this area, Qwest expects to implement an additional system capability in EDI

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*See* WorldCom at 15, Lichtenberg Decl. at ¶ 25.

*See* WorldCom at 16-17, Lichtenberg Decl. at ¶¶ 26-28.

version 12.0 to simplify the process for submitting subsequent LSRs for such

orders. This change will create a new field *to* allow CLECs to specify that the

LSR submitted is a subsequent change to a pending order. This will prevent

Qwest's OSS from running an "ownership" check on such orders before

processing, making the submission of such orders easier.

D.      Loop Qualification Language in Oregon SGAT

*33.*     AT&T claims that Qwest's SGAT in Oregon does not

include Section 9.2.2.2.1.1, which can be found in all other Qwest state

SGATs and permits CLECs to obtain information on spare copper facilities

where Qwest has deployed significant amounts of Integrated Digital Loop

Carrier ("IDLC") technology so they can determine whether there are

facilities that can readily accommodate advanced services such as Digital

Subscriber Line ("DSL").

34.     To minimize confusion in the course of its Section 271

proceeding, Qwest would modify its SGAT to reflect only (1) those terms

agreed to by all parties, or (2) terms specified by the PUC. As a result, it

appears that Section 9.2.2.2.1.1 – which was neither subject to agreement by

the parties (it was initially opposed by AT&T) nor specified by the PUC for

inclusion – was omitted from Qwest's SGAT in Oregon. [18] Nevertheless, the

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*See* AT&T Comments at 29-30.

I note that in the course of investigating this issue. Qwest discovered that it had inadvertently failed to include in the Oregon SGAT the provision under which CLECs may request an audit of Qwest's facilities if they disagree with loop qualification information returned by Qwest. That provision was added to the Oregon SGAT on February 21, 2003.
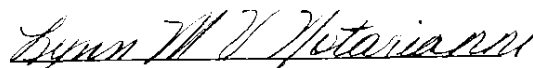
option of obtaining this type of information has been available to CLECs in Oregon and elsewhere since August 2001. Qwest corrected this omission by filing an amendment to its SGAT in Oregon on February 21, 2003. This amendment, assuming it is approved by the Oregon PUC on March **31,** will become effective on April **1,**2003.

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*See* Oregon SGAT at 9.2.2.8. This omission did not adversely affect CLECs because the right to audit has been universally available throughout Qwest's region since inid-2002.

# **VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct.

*Lynn M V Notarianni*
Lynn M V Notarianni

Executed on ___02 - 21 - 2003___.

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct.

Christie L. Doherty

Executed on ___2-24-03___